

SAMUEL BERNARD JOHNSON, III
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Plaintiff - *In Pro Se*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

SAMUEL BERNARD JOHNSON III,
Plaintiff,

vs.

CHEVRON CORPORATION, a Delaware
corporation, CHEVRON CORPORATION
LONG-TERM DISABILITY PLAN
ORGANIZATION, a Delaware corporation,
CHEVRON ENVIRONMENTAL
MANAGEMENT COMPANY, a California
corporation, CATHERINE DREW,
KATHRYN M. GALLACHER, ROBERT
SCHMITT, HARALD SMEDAL, SUSAN
J. SOLGER, SELLERS STOUGH,
KRYSTAL TRAN, DEBBIE WONG,
GARY A. YAMASHITA, and DOES 1-5,

Defendants

Case No.: C 07-05756 SI (JCS)

**PLAINTIFF'S OBJECTIONS AND NOTICE
OF INTENT TO MOVE TO QUASH THE
SUBPEONA ISSUED TO THE
"CALIFORNIA HEALTHH AND WELFARE
AGENCY – CALIFORNIA OF SOCIAL
SERVICES FRANK FU"**

PLAINTIFF'S NOTICE OF INTENT TO MOVE TO QUASH SUBPOENA ISSUED TO THE
CALIFORNIA HEALTH AND WELFARE AGENCY – CALIFORNIA OF SOCIAL SERVICES FRANK
FU, CASE NO. C 07-05756 SI (JCS)

1 **TO DEFENDANTS CHEVRON CORPORATION, CHEVRON**
2 **ENVIRONMENTAL MANAGEMENT COMPANY, THEIR ATTORNEY OF RECORD,**
3 **FIRST REPROGRAPHICS AND THE CALIFORNIA HEALTH AND WELFARE**
4 **AGENCY – CALIFORNIA OF SOCIAL SERVICES FRANK FU:**

5 **PLEASE TAKE NOTICE** that Samuel Bernard Johnson III (hereinafter referred to as
6 “Plaintiff Johnson”) **HEREBY OBJECTS TO**, and intends to **MOVE TO QUASH** in its
7 entirety, the subpoena issued by First Reprographics, Chevron Corporation, Chevron
8 Environmental Management Company and their attorney of record Filice Brown Eassa &
9 McLeod LLP to the California Health and Welfare Agency – California of Social Services Frank
10 Fu seeking the production of certain personnel records (requested on Attachment To Subpoena
11 In A Civil Case) pertaining to Plaintiff Johnson on August 29, 2008.

12 Plaintiff Johnson asserts that the subpoena is improper and no records (requested on
13 Attachment To Subpoena In A Civil Case) should be produced to First Reprographics, Chevron
14 Corporation, Chevron Environmental Management Company and their attorney of record Filice
15 Brown Eassa & McLeod LLP on the following grounds, until the objections and/or motion to the
16 Court is resolved:

- 17 • Failure of Chevron Corporation, Chevron Environmental Management
18 Company and their attorney of record Filice Brown Eassa & McLeod LLP
19 to properly serve Plaintiff Johnson with notice of the subpoena prior to its
20 issuance by First Reprographics to California Health and Welfare Agency
21 – California of Social Services Frank Fu.;
- 22 • Failure of First Reprographics, Chevron Corporation, Chevron
23 Environmental Management Company and their attorney of record Filice
24 Brown Eassa & McLeod LLP to provide timely notice to Plaintiff Johnson
25 of the issuance of the subpoena prior to its issuance;
- 26 • Lack of relevance of the requested documents to Plaintiff Johnson’s
27 claims in this action;
- 28 • Lack of relevance of the requested documents to Chevron Corporation and

Chevron Environmental Management Company's defenses against Plaintiff Johnson's claims in this action;

- The requested records are precluded from being released pursuant to California law and such was explained to Filice Brown & Eassa McLeod LLP prior to it issuing any subpoena pertaining to Plaintiff Johnson's two minor children;
- The subpoena seeks to harass and intimidate Plaintiff Johnson; and
- The subpoena lists the entities name incorrectly.

/s/

Dated this 25th day August of 2008

SAMUEL BERNARD JOHNSON III